

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:))
)	Chapter 11
FTX TRADING LTD., <i>et al.</i> ¹))
)	Case No. 22-11068 (JTD)
Debtors.))
)	(Jointly Administered)
))
ALAMEDA RESEARCH LLC,))
ALAMEDA RESEARCH LTD., FTX))
TRADING LTD., WEST REALM))
SHIRES, INC., and WEST REALM))
SHIRES SERVICES, INC.,)	Adv. Pro. No. 23-50145 (JTD)
))
Plaintiffs,))
))
-against-))
FTX DIGITAL MARKETS LTD., BRIAN)	Hearing Date: TBD
C. SIMMS, KEVIN G. CAMBRIDGE, and)	Objection Deadline: September 15, 2023 at
PETER GREAVES, and J. DOES 1-20,)	4:00 p.m. (ET)
))
Defendants.))
))
FTX DIGITAL MARKETS LTD., BRIAN))
C. SIMMS, KEVIN G. CAMBRIDGE, and))
PETER GREAVES,))
))
Counterclaim-Plaintiffs,))
))
-against-))
ALAMEDA RESEARCH LLC, <i>et al.</i> ,))
))
Counterclaim-Defendants.))
))

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

ALAMEDA RESEARCH LLC, <i>et al.</i> ,)
)
Counterclaim-Plaintiffs,)
)
-against-)
)
FTX DIGITAL MARKETS LTD., BRIAN)
C. SIMMS, KEVIN G. CAMBRIDGE, and)
PETER GREAVES,)
)
Counterclaim-Defendants.)
)

JOINDER OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO DEBTORS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS WITHHELD PURSUANT TO BAHAMIAN PRIVILEGE

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors and debtors-in-possession (the “Debtors”), by and through its undersigned counsel, hereby submits this joinder (the “Joinder”) to the *Debtors’ Motion to Compel Production of Documents Withheld Pursuant to Bahamian Privilege* [Docket No. 52] (the “Motion to Compel”).² In support of this Joinder, the Committee respectfully states as follows:

The Committee is a plaintiff in the above-captioned adversary proceeding pursuant to the *Order Permitting Intervention by the Official Committee of Unsecured Creditors* [Docket No. 21]. For the reasons set forth in the Motion to Compel, which the Committee joins in and adopts as if fully set forth herein, the Court should grant the Motion to Compel, overrule the JPLs’ objections to producing the Requested Materials, and order the JPLs to produce the Requested Materials to the Debtors and the Committee as soon as possible. The Committee reserves all rights to amend and/or supplement this Joinder, attend the hearing on the Motion to Compel, and to make

² Capitalized terms used in this Joinder and not defined herein shall have the meanings ascribed to them in the Motion to Compel.

arguments as may be applicable, including, but not limited to, as a result of information learned subsequent to the filing of this Joinder.

Dated: September 6, 2023
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Robert F. Poppiti, Jr.
Matthew B. Lunn (No. 4119)
Robert F. Poppiti, Jr. (No. 5052)
1000 North King Street
Wilmington, DE 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: mlunn@ycst.com
rpoppetti@ycst.com

-and-

PAUL HASTINGS LLP
Kristopher M. Hansen*
Kenneth Pasquale*
Isaac S. Sasson*
200 Park Avenue
New York, NY 10166
Telephone: (212) 318-6000
Facsimile: (212) 319-4090
Email: krishansen@paulhastings.com
kenpasquale@paulhastings.com
isaacsasson@paulhastings.com

**Admitted pro hac vice*

Counsel to the Official Committee of Unsecured Creditors